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October 19, 2009

**VIA ELECTRONIC FILING**

Mr. Charles L.A. Terreni  
Chief Clerk/Administrator  
South Carolina Public Service Commission  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: Application for Approval of Change in Methodology by Which Piedmont Natural Gas Company, Incorporated Calculates and Records LAUF Adjustments to Its Gas Cost  
**Docket No. 2009-435-E**

Dear Mr. Terreni:

The South Carolina Office of Regulatory Staff ("ORS") has discussed this request for a change in the calculation and recording of Piedmont Natural Gas Company, Incorporated's ("Piedmont") LAUF with representatives of the company. ORS has no objections to approval of the requested modification. ORS believes that Piedmont's proposed change should benefit both the company and its customers by providing a more timely and accurate "True-up" of costs associated with LAUF gas.

Thank you for your attention to this matter. Should you have any questions, please contact me at (803) 737-0823.

Very truly yours,

  
Jeffrey M. Nelson

cc: Scott M. Tyler, Esquire